

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION IN U.S. DISTRICT COURT

 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

21 USC Sections 846, 841(a)(1), 841(b)(1)(C)

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY:

See penalty sheet attachment

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Att'y ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant

☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE CASE NO.

10-70336 BZ

 Name and Office of Person
 Furnishing Information on
 THIS FORM

Joseph P. Russoniello

☒ U.S. Att'y ☐ Other U.S. Agency

 Name of Asst. U.S. Att'y
 (if assigned)

Nicole M. Kim

 Name of District Court, and/or Judge/Magistrate Location
 NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S. 6

YURI LAMBERT

DISTRICT COURT NUMBER

DEFENDANT

IS NOT IN CUSTODY

- 1) ☐ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☒ Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

 Has detainer
 been filed? ☐ Yes ☐ No

 If "Yes"
 give date
 filed

DATE OF ARREST

Month/Day/Year

4/23/2010

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

☐ SUMMONS ☒ NO PROCESS*

☐ WARRANT Bail Amount:

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

**PENALTY SHEET ATTACHMENT:
YURI LAMBERT**

Count 1

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 2

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

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PENALTY:

See penalty sheet attachment

PROCEEDING

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MAGISTRATE CASE NO.

10-70336 BZ

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 THIS FORM

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☒ U.S. Att'y ☐ Other U.S. Agency

 Name of Asst. U.S. Att'y
 (if assigned)

Nicole M. Kim

 Name of District Court, and/or Judge/Magistrate Location
 NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

JAMES EDMONDS

DISTRICT COURT NUMBER

DEFENDANT**IS NOT IN CUSTODY**

- 1)
- ☐
- Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
-
- 2)
- ☐
- Is a Fugitive
-
- 3)
- ☒
- Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY

- 4)
- ☐
- On this charge
-
- 5)
- ☐
- On another conviction
-
- 6)
- ☐
- Awaiting trial on other charges }
- ☐
- Fed'l
- ☐
- State

If answer to (6) is "Yes", show name of institution

Has detainer been filed?

☐ Yes
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DATE OF ARREST

Month/Day/Year

4/23/2010

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Month/Day/Year

☐ This report amends AO 257 previously submitted
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☐ SUMMONS ☒ NO PROCESS*
☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: _____

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments: _____

**PENALTY SHEET ATTACHMENT:
JAMES EDMONDS**

CR 10

FILED JSW
2010 MAY 03 3:22
CLERK OF U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Count 1

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

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See penalty sheet attachment

PROCEEDING

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SHOW
DOCKET NO.MAGISTRATE
CASE NO.

10-70336 BZ

 Name and Office of Person
 Furnishing Information on
 THIS FORM

Joseph P. Russoniello

☒ U.S. Att'y ☐ Other U.S. Agency

 Name of Asst. U.S. Att'y
 (if assigned)

Nicole M. Kim

 Name of District Court, and/or Judge/Magistrate Location
 NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT: U.S.

OSHAN COOK

DISTRICT COURT NUMBER

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Northern District of California

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Month/Day/Year

4/23/2010

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Month/Day/Year

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 *Where defendant previously apprehended on complaint, no new summons
 or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

PENALTY SHEET ATTACHMENT:
OSHAN COOK

FILED
2010 MAY 03 10
RICHARD W. WIERING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
JWSW

Count 1

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 2

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 3

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

21 USC Sections 846, 841(a)(1), 841(b)(1)(C)

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony
PENALTY:

See penalty sheet attachment

PROCEEDING

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SHOW
DOCKET NO.MAGISTRATE
CASE NO.

10-70336 BZ

Name and Office of Person

Furnishing Information on
THIS FORM

Joseph P. Russoniello

☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y

(if assigned)

Nicole M. Kim

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S. CLERK

VICTORIA VANLAANEN

DISTRICT COURT NUMBER

CR 10 0376

DEFENDANT**IS NOT IN CUSTODY**

- 1) ☐ Has not been arrested, pending outcome this proceeding. If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☒ Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of Institution

Has detainer
been filed?
☐ Yes
☐ No
If "Yes"
give date
filed**DATE OF
ARREST**Month/Day/Year
4/23/2010

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS*

☐ WARRANT Bail Amount:

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

**PENALTY SHEET ATTACHMENT:
VICTORIA VANLAANEN**

CR 10-0376
FILED JSW
2010 MAY -6 PM 22
RICHARD W. WIEGAND
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Count 1

21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C) - Conspiracy to distribute and possess with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

Count 2

21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) - Possession with intent to distribute 3,4 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance.

Maximum sentence of 20 years in prison, a \$1 million fine, maximum term of supervised release of life, minimum term of supervised release of 3 years, and \$100 special assessment.

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILE
2010 MAY 03 7 03 PM
JRW
CLERK OF COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
V.

YURI LAMBERT,
JAMES EDMONDS,
OSHAN COOK, and
VICTORIA VANLAANEN,

DEFENDANTS

INDICTMENT

21 U.S.C. § 846- Conspiracy to Possess with Intent to Distribute and to Distribute
MDMA;
21 U.S.C. §§ 841(a)(1) & (b)(1)(C) - Possession with Intent to Distribute MDMA;
18 U.S.C. § 2 - Aiding and Abetting; Criminal Forfeiture Allegation

A true bill.

Lynda Benjamin
Foreman

Filed in open court this 6 day of

May, 2010

Karen L. Horn

JOSEPH C. SPERO

KAREN L. HORN
Clerk

UNITED STATES MAGISTRATE JUDGE

Bail, \$

no prom

JOSEPH P. RUSSONIELLO (CABN 44332)
United States Attorney

FILED
2010 MAY -6 P 3:22
RICHARD W. WIERING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JSW

UNITED STATES OF AMERICA

CR

N 10 0376

v.

YURI LAMBERT,
JAMES EDMONDS,
OSHAN COOK, and
VICTORIA VANLAANEN,

VIOLATIONS: 21 U.S.C. § 846 –
Conspiracy to Possess with Intent to
Distribute and to Distribute MDMA;
21 U.S.C. §§ 841(a)(1) & (b)(1)(C) –
Possession with Intent to Distribute MDMA;
18 U.S.C. § 2 – Aiding and Abetting;
Criminal Forfeiture Allegation

SAN FRANCISCO VENUE

Defendants.

INDICTMENT

The Grand Jury charges:

COUNT ONE:

Beginning at a time unknown to the Grand Jury, but no later than in or around March 2010, and continuing thereafter up through and including April 22, 2010, both dates being approximate and inclusive, in the Northern District of California and elsewhere, the defendants,

YURI LAMBERT,
JAMES EDMONDS,
OSHAN COOK, and
VICTORIA VANLAANEN,

INDICTMENT

248

1 and others known and unknown, knowingly and intentionally conspired to possess with intent to
 2 distribute and to distribute 3,4-Methylenedioxymethamphetamine (MDMA), a Schedule I
 3 controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and
 4 841(b)(1)(C).

5 COUNT TWO:

6 On or about April 22, 2010, in the Northern District of California, the defendants,

7 YURI LAMBERT,
 8 JAMES EDMONDS,
 9 OSHAN COOK, and
 VICTORIA VANLAANEN,

10 did knowingly and intentionally possess with intent to distribute
 11 3,4-Methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance, in violation
 12 of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States
 13 Code, Section 2.

14 COUNT THREE:

15 On or about April 22, 2010, in the Northern District of California, the defendant,

16 OSHAN COOK,

17 did knowingly and intentionally possess with intent to distribute 3,4
 18 methylenedioxymethamphetamine (MDMA), a Schedule I controlled substance, in violation of
 19 Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States
 20 Code, Section 2.

21 FORFEITURE ALLEGATION:

22 1. The factual allegations contained in Counts One, Two and Three of this
 23 Indictment are re-alleged and fully incorporated herein for the purpose of alleging forfeiture
 24 pursuant to the provisions of 21 U.S.C. §§ 853(a)(1) and (a)(2).

25 2. Upon a conviction of any of the offenses alleged in Counts One, Two and Three

26 //

27 //

28 //

of this Indictment, the defendants,

YURI LAMBERT,
JAMES EDMONDS,
OSHAN COOK, and
VICTORIA VANLAANEN,

shall forfeit to the United States all right, title, and interest in property constituting and derived from any proceeds defendants obtained, directly or indirectly, as a result of said violations, and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of the said violations.

3. If, as a result of any act or omission of the defendants, any of said property

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

any and all interest defendants have in any other property (not to exceed the value of the above forfeitable property) shall be vested in the United States and forfeited to the United States.

All in violation of Title 21, United States Code, Section 853(a)(1), (a)(2), (p) and Rule 32.2 of the Federal Rules of Criminal Procedure.

DATED:

May 6, 2010

A TRUE BILL.

Linda Benjamin
FOREPERSON

JOSEPH P. RUSSONIELLO
United States Attorney

John J. Stretch
BRIAN J. STRETCH
Chief, Criminal Division

(Approved as to form: *Nicole M. Kim*)
AUSA NICOLE M. KIM